

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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Teachers4Action et al,	:		Civil Action #
	:		08-cv-548 (VM)(AJP)
v.	:		
	:		
Bloomberg et al,	:		
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	:		
	:		
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**MOTION FOR (i) ORDER SEALING CERTAIN DOCUMENTS, (ii) ORDER
RELIEVING ED FAGAN AS COUNSEL FOR PLAINTIFF LEWENSTEIN, (iii)
ORDER PURSUANT TO FRCP 42 (b) SEVERING CLAIMS, (iv) ORDER
DIRECTING PLAINTIFF LEWENSTEIN TO TURN OVER CLIENT
DOCUMENTS, (v) ORDER GRANTING BRIEF ADJOURNMENT OF PRESENT
MOTION SCHEDULE IN ACCORDANCE WITH AGREEMENTS BETWEEN
COUNSEL AND (vi) FOR OTHER JUST & EQUITABLE RELIEF**

PLEASE TAKE NOTICE that the above referenced will move this Honorable Court, as soon as counsel can be heard, at the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, Courtroom 20 D, before the Honorable Andrew J. Peck, USMJ, for, among other things,

1. An Order Sealing Certain Documents attached with the un-redacted portion of the Declaration in support of this Motion;
2. An Order Relieving Ed Fagan as Counsel for Plaintiff Florian Lewenstein;
3. An Order Pursuant to FRCP 42 (b) Severing Lewenstein's claims;
4. An Order Granting a Brief Adjournment of the Motion Schedule in accordance with agreements already entered into with Defense Counsel;
5. For such other and further relief as the Court deems just and equitable.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Movants shall rely upon the attached Declaration of Edward D. Fagan and supporting Memorandum.

PLEASE TAKE FURTHER NOTICE that opposition, if any, should be filed in accordance with the Federal Rules of Civil Procedure and the Local Rules of the Southern District.

Dated: August 1, 2008
New York, NY

/s/ Edward D. Fagan (electronically signed)

Edward D. Fagan Esq.
5 Penn Plaza, 23rd Floor
New York, NY 10001
Tel. (646) 378-2225
Plaintiffs' Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing

MOTION FOR (i) ORDER SEALING CERTAIN DOCUMENTS, (ii) ORDER RELIEVING ED FAGAN AS COUNSEL FOR PLAINTIFF LEWENSTEIN, (iii) ORDER PURSUANT TO FRCP 42 (b) SEVERING CLAIMS, (iv) ORDER DIRECTING PLAINTIFF LEWENSTEIN TO TURN OVER CLIENT DOCUMENTS, (v) ORDER GRANTING BRIEF ADJOURNMENT OF PRESENT MOTION SCHEDULE IN ACCORDANCE WITH AGREEMENTS BETWEEN COUNSEL AND (vi) FOR OTHER JUST & EQUITABLE RELIEF

along with supporting Affidavits/Declarations and Accompanying Memorandum of Law are being electronically filed with the Clerk of the Court.

Hard copies of the papers are being mailed with proof of receipt requested and transmitted electronically to:

Florian Lewenstein
8401 Main St, Apt 419
Jamaica, NY 11435-1708
Email: florianjl@juno.com and florianjl@gmail.com

In addition, courtesy copies of the papers will be electronically transmitted and/or mailed to each of the counsel of record in all matters.

Dated: August 1, 2008
New York, NY

/s/ Edward D. Fagan (electronically signed)
Edward D. Fagan, Esq.